

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 21 U.S.C. § 841 (Possession with Intent to Distribute Cocaine) have been committed by [REDACTED] and [REDACTED] [REDACTED] in the Southern District of Alabama and elsewhere. There is also probable cause to search the information for evidence of these crimes, as described in Attachment A.

15. In my training and experience, I have learned that T-Mobile is a company that provides cellular telephone access to the general public.

18. Because the cellular device generally attempts to communicate with the closest unobstructed tower, by reviewing the above-described information, your affiant and other law enforcement officers can determine the approximate geographic area from which the communication originated or was received.

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INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

23. Because the information is to be provided by T-Mobile and does not involve any physical intrusion by the government or any investigative agency, it is respectfully suggested that the normal time constraints requiring that the warrant be executed only in the daytime are not applicable.

24. Based on the foregoing, I submit that there is probable cause to conclude that that the cellular telephone having the number [REDACTED] was possessed by [REDACTED] and/or [REDACTED] while committing violation of 21 U.S.C. § 841 and was used to facilitate and coordinate that violation and that the requested information associated with the cellular telephone as further described herein and in Attachment A, is available from T-Mobile and that information.

including cell site information, constitutes evidence of violations of 21 U.S.C. § 841. Accordingly,
I respectfully request that the Court issue the proposed search warrant.

Respectfully submitted,

RANDALL L
HOFFMAN

Digitally signed by RANDALL L
HOFFMAN
Date: 2023.06.13 11:47:57 -05'00'

RANDALL L. HOFFMAN
Special Agent
Department of Homeland Security
Homeland Security Investigations (HSI)

THE ABOVE AGENT HAD ATTESTED
TO THIS AFFIDAVIT PURSUANT TO
FED. R. CRIM. P. 4.1(b)(2)(A) THIS
_____, JUNE 15, 2023.

P. Bradley Murray

Digitally signed by P. Bradley Murray
Date: 2023.06.15 10:03:33 -05'00'

HONORABLE P. BRADLEY MURRAY
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property to Be Searched

1. The cellular telephone assigned call number [REDACTED] (the “Account”) whose wireless service provider is T-Mobile USA, Inc. a company headquartered in New Jersey.
2. Records and information associated with the Target Cell Phone that is within the possession, custody, or control of T-Mobile USA, Inc. including information about the historical location of the cellular telephone and contents of communications, as further described in Attachment B.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by T-Mobile

T-Mobile, USA Inc. is required to disclose the following records and other information, if available, to the United States for the cellular telephone having the number [REDACTED] which are stored at premises owned, maintained, controlled, or operated by T-Mobile, a wireless provider located in New Jersey (“Account”), for the time period May 1, 2023 to the present:

- A. The following information about the customers or subscribers of the Account:
1. Names (including subscriber names, user names, and screen names);
 2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
 3. Local and long distance telephone connection records;
 4. Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol (“IP”) addresses) associated with those sessions; to include IP data session reports with associated cell site information;
 5. Length of service (including start date) and types of service utilized;
 6. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers (“ESN”), Mobile Electronic Identity Numbers (“MEIN”), Mobile Equipment Identifier (“MEID”), Mobile Identification Numbers (“MIN”), Subscriber Identity Modules (“SIM”), Mobile Subscriber Integrated Services Digital Network Number (“MSISDN”), International Mobile Subscriber Identifiers (“IMSI”), or International Mobile Equipment Identities (“IMEI”));
 7. Other subscriber numbers or identities (including the registration Internet Protocol (“IP”) address); and
 8. Means and source of payment for such service (including any credit card or bank account number) and billing records.
 9. The content of communications, to the extent that they are available or were preserved.

- B. All records and other information (including the contents of communications) relating to the Account, including:
1. Information about each communication sent or received by the Account, including the date and time of the communication, the method of communication, and the source and destination of the communication (such as source and destination telephone numbers (call detail records), email addresses, and IP addresses); and
 2. All data about which “cell towers” (i.e., antenna towers covering specific geographic areas), “sectors” (i.e., faces of the towers), and (if available) “azimuth” received a radio signal from each cellular telephone or device assigned to the Account; and
 3. RTT records, PCMD records, NELOS records, Timing Advance records, TrueCall records, MDT GPS records, and all other records containing timing advance measurements and distance-to-tower measurements for all technologies (CDMA, GSM, UMTS, LTE, etc.); and
 4. Records of user activity for each connection made to or from the Account, including log files; messaging logs; the date, time, length, and method of connections; data transfer volume; user names; and source and destination Internet Protocol addresses.

- (a) The location of the user of the account at times relevant to the investigation.
- (b) The content of user or owner's communications that may be evidence of the alleged crime;
- (c) The content of communications concerning the account user or owner's efforts to conceal the crime;
- (d) The identity of the person(s) who created or used the account or identifier, including records that help reveal the whereabouts of such person(s).
- (e) The identity of witnesses and/or co-conspirators with whom the account user communicated.